



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960
DEC - 3 2003

4APT-APB

Carol A. Couch, Ph.D., Director,
Georgia Environmental Protection Division
2 Martin Luther King, Jr. Drive, S.E.
Suite 1152 East Tower
Atlanta, GA 30334-9000

Dear Ms. Couch:

Thank you for your State's recommendations on 8-hour ozone air quality designations. This recommendation is an important step in providing citizens of Georgia with information on air pollution levels where they live and work. Levels of ground-level ozone have improved significantly since the Clean Air Act (CAA) was amended in 1990, at which time 135 areas were designated as not attaining the 1-hour ozone standard. Since that time nearly half those areas (67) have cleaned up their air to meet the 1-hour ozone standard and have been redesignated as attaining that standard. However, many areas have still not met the less stringent 1-hour ozone standard and in 1997, the U.S. Environmental Protection Agency (EPA) promulgated a more stringent 8-hour ozone national ambient air quality standard. Thus, much work remains to be done. Under the CAA, EPA is required to promulgate designations for new or revised standards, such as the 8-hour ozone standard. Earlier this year, after several public interest groups filed a lawsuit claiming EPA had not met the statutory deadline for designating areas for the 8-hour ozone standard, we entered into a consent decree that requires us to promulgate designations by April 15, 2004.

The CAA defines a nonattainment area as any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant. EPA guidance indicates that Georgia should use the larger of the Consolidated Metropolitan Statistical Area (CMSA), Metropolitan Statistical Area (CMSA), or the 1-hour ozone nonattainment area as the presumptive boundary for 8-hour ozone nonattainment areas. The guidance provides 11 factors that Georgia should consider in determining whether to modify the presumptive boundaries. We have reviewed the letter from Mr. Harold Reheis, dated July 15, 2003, submitting Georgia's recommendations on air quality designations for the 8-hour ozone standard. We have also reviewed the extensive justification information you have submitted to support your recommendations for areas that differed from the presumptive nonattainment area. We appreciate the effort the State has made to develop this supporting information.

Consistent with section 107(d)(1) of the CAA, this letter is to inform you that, based upon the information contained in your submittal, EPA intends to make modifications to Georgia's recommended designations and boundaries. Additionally, the EPA Headquarters' Office of Air

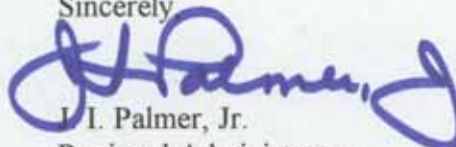
and Radiation believes that all MSA counties that are part of an Early Action Compact (EAC) area that contains a violating ozone monitor should be included as part of one area that would be designated as nonattainment. EPA is issuing a proposed rule to defer the effective date for these areas for so long as they continue to meet the milestones required for EAC areas. In Georgia, we intend to modify the State's recommendation to include Walker County in the Chattanooga area. EPA will work with the State over the next few months to determine whether any information the State submits by February 6, 2004, justifies drawing different boundaries for the nonattainment area.

EPA has been tracking preliminary 2003 ozone monitoring data and its impact on areas' 2001-2003 design values. We received a letter from Mr. David Word, dated November 14, 2003, informing us that the ozone monitoring data for 2003 has completed the full quality assurance and quality control process and has been fully uploaded into the Air Quality System (AQS). According to this data, the Augusta-Aiken area is now meeting the 8-hour ozone standard, and, because of this, Mr. Word revised your official recommendation for Richmond County, Georgia, to attainment. In addition to the data you have submitted into AQS, please submit the 8-hour and 1-hour ozone design values and the average expected 1-hour exceedance rate to Beverly Banister, Director, Air Pesticides and Toxics Management Division, by December 17, 2003, so that air quality designations and classifications for the 8-hour standard will accurately reflect the State's air quality.

The enclosures to this letter provides tables in which EPA identifies the counties that should be included in each nonattainment area. Enclosure 1 contains a description of areas where EPA intends to modify Georgia's recommendation, and the basis for such modification. Enclosure 2 provides information on those areas/counties which do not require modification, but which differ from EPA's presumptive nonattainment area.

We look forward to a continued dialogue with Georgia as we work to finalize the designations for the 8-hour ozone standard. We appreciate your efforts and will review any future supporting information that Georgia wishes to submit on these recommendations. If you have any questions, please do not hesitate to contact Beverly Banister, Director, Air Pesticides and Toxics Management Division, at (404)562-9326 or Kay Prince, Chief, Air Planning Branch, at (404)-562-9026.

Sincerely



J. I. Palmer, Jr.
Regional Administrator

Enclosure

cc: Ron Methier, Chief, Air Protection Branch, Georgia EPD

Lewis Shaw, Deputy Commissioner, SCDHEC

James A. Joy, III, P.E., Chief, Bureau of Air Quality Control, SC DHEC

Betsy L. Child, Commissioner, TDEC

Barry R. Stephens, P.E., Director, Division of Air Pollution Control, TDEC

Enclosure 1

The following table identifies the individual areas and counties comprising those areas within Georgia that EPA intends to designate as nonattainment. Following the table is a description of areas where EPA intends to modify Georgia's recommendation, and the basis for such modification. Where EPA intends to include only part of a county in a nonattainment area, we have indicated the boundaries of the portion of the county that will be included. EPA intends to designate as attainment/unclassifiable all counties (or parts thereof) not identified in the table below.

Nonattainment Areas		
Area	Georgia Recommended Nonattainment Counties	EPA Recommended Nonattainment Counties
Atlanta	Barrow, Bartow, Carroll, Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Hall, Henry, Newton, Paulding, Rockdale, Spalding and Walton	Barrow, Bartow, Carroll, Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Hall, Henry, Newton, Paulding, Rockdale, Spalding and Walton
Chattanooga TN-GA*	None	Catoosa and Walker
Macon	Bibb	Bibb, Houston and Monroe
Murray County	Murray County - all mountain peaks within the Chattahoochee National Forest area of Murray County that have an elevation greater than or equal to 2400 feet and that are enclosed by contour lines that close on themselves.	Murray County - all mountain peaks within the Chattahoochee National Forest area of Murray County that have an elevation greater than or equal to 2400 feet and that are enclosed by contour lines that close on themselves.

**This is an interstate area. A letter addressing the Tennessee portion of this area was sent to the Environmental Commissioner of Tennessee.*

Background

Georgia's submittal included a description of the specific methodology the State used to exclude, or include, counties in the presumptive nonattainment area, i.e., the CMSA. Georgia's methodology used to arrive at their recommendations was based on a set of criteria based on EPA's 11 factors and input received from other State agencies. This methodology set specific cut points for the factors described below. The process is explained in Georgia's July 15, 2003, recommendation. The screening criteria were: (1) projected 2007 population density exceeding the minimum value that corresponds to a monitored violation within a CMSA; (2) Projected 2007 nitrogen oxides (NOx) or volatile organic compounds (VOC) emissions density exceeding the minimum value that corresponds to a known monitored violation within a CMSA; (3) Daily commuting trips (year 2000) basis from a county into the nonattainment area exceeding the minimum number of daily in-commutes for an existing nonattainment county; and (4) Summer daily non-interstate vehicle miles traveled (VMT) exceeding the minimum summer daily non-interstate VMT for an existing nonattainment county (year 2001 basis).

Modifications to Georgia's Recommendations

Macon, Georgia

Houston County:

The State recommended Bibb County, which is one of the five CMSA counties in the Macon area. EPA intends to modify the State's recommendation to include Houston County in the Macon nonattainment area. EPA is recommending the inclusion of Houston County in the Macon nonattainment area because of its similarities to Bibb County, which is the county with the violating monitor. Houston County is a CMSA county with a population of 110,765 in the year 2000, and a projected population growth rate of 17 percent (18,300 people) from 2000 to 2010. Additionally, in the analysis conducted by the State of Georgia based on the 11 factors, Houston County exceeded three of the criteria for inclusion in a nonattainment area as set forth by the State. Houston County exceeded the State's criteria of population density (336 people per square mile) in 2007, density of nitrogen oxides (NOx) (21 ton per year/square mile) in 2007, volatile organic compound (VOC) density (14 tons per year/square mile) in 2007, and 2001 Summer Daily vehicle miles traveled (VMT) (2,510,758 miles per day). These values indicated a high probability that Houston County is contributing to the violations measured in Bibb County. The State did not provide a compelling argument based on the 11 factors to exclude Houston County from the nonattainment area.

Monroe County:

EPA also intends to modify the State's recommendation to include Monroe County to the Macon nonattainment area. While this county is outside of the presumptive boundary, EPA is recommending the inclusion of Monroe County in the Macon nonattainment area because it is adjacent to the core CMSA county of Bibb and has a large source of NOx emissions (46,479 tons

per year), Georgia Power Company's Plant Scherer, which does not have state of the art NOx controls and adversely impacts the air quality in Bibb County. The State did not provide a compelling argument based on the 11 factors to exclude Monroe County from the nonattainment area.

Chattanooga, GA-TN

Catoosa County:

Georgia recommended all of the three Georgia counties within the Chattanooga CMSA as attainment. EPA is modifying the State's recommendations to include Catoosa County in the Chattanooga nonattainment area because Catoosa County is a CMSA county with a relatively high population (53,282) in the year 2000 and is experiencing a high population growth rate (13,408 people or 25 percent) from 2000 to 2010. Catoosa County also has a high percentage (80 percent) of commuters traveling into the core CMSA counties. Additionally, in the analysis conducted by the State of Georgia, Catoosa County exceeded two of the criteria for inclusion in a nonattainment area as set forth by the State. Catoosa County exceeded the State's criteria of population density (384 people per square mile) in 2007, NOx density (16 tons per year/square mile) in 2007, and VOC density (18 tons per year/square mile) in 2007. The State did not provide a compelling argument based on the 11 factors to exclude Catoosa County from the nonattainment area.

Walker County:

EPA is modifying the State's recommendation to include Walker County in the Chattanooga TN-GA nonattainment area because it is within the Chattanooga MSA, which has a violating monitor and this county is a participant in the Chattanooga Early Action Compact (EAC). Walker County, as well as other Chattanooga MSA counties in the EAC, will be designated nonattainment with a deferred effective date so long as the Chattanooga EAC meets all of the required milestones.

Enclosure 2

This table identifies counties which would otherwise be included in a nonattainment area's presumptive boundary, in accordance with EPA's March 28, 2000, Boundary Guidance Memorandum, but which have been omitted from the State's recommendations for nonattainment areas, and for which EPA is not modifying. Following this table is a discussion of the justification for omitting each county from the nonattainment area.

Justification for Less than Presumptive Boundaries	
Area	"Presumptive" Counties Excluded from Nonattainment Area
Atlanta	Pickens
Chattanooga TN-GA	Dade
Macon	Twiggs Peach Jones

Background

Georgia's methodology used to arrive at their recommendations was based on a set of criteria developed from EPA's guidance factors and input received from other State agencies. The process is explained in Georgia's July 15, 2003, recommendation. The screening criteria were: (1) projected 2007 population density exceeding the minimum value that corresponds to a known monitored violation within a CMSA; (2) Projected 2007 NOx or VOC emissions density exceeding the minimum value that corresponds to a known monitored violation within a CMSA; (3) Daily commuting trips (year 2000) basis from a county into the nonattainment area exceeding the minimum number of daily in-commutes for an existing nonattainment county; and (4) Summer daily non-interstate vehicle miles traveled (VMT) exceeding the minimum summer daily non-interstate VMT for an existing nonattainment county (year 2001 basis).

Atlanta

Pickens County:

EPA concurs with the State of Georgia's decision to recommend Pickens County as attainment. Pickens County is within the CMSA, but has very low population (22,983) as compared to one of the larger CMSA county such as Fulton County (816,006) and is much less than one percent of the over 4 million people in the Atlanta CMSA. It has low NOx emissions (1,060 tons per year - less than one percent of the CMSA emissions), and low VOC emissions (1,774 tons per year - approximately one percent of the CMSA emissions). Additionally, Pickens

County did not exceed any of the State's criteria for inclusion into a nonattainment area.

Chattanooga, TN-GA

Dade County:

EPA concurs with the State of Georgia's decision to recommend Dade County as attainment. Dade County is an CMSA county, but has very low population (15,154) as compared to the core CMSA county of Hamilton County, TN (307,896); or the entire CMSA population of over 450,000. The population growth is 17 percent, but the increase in the number of people, at 2,553, is a very small increase in actual people, compared to the population of the entire CMSA. The County has low NOx emissions (2,419 tons per year) compared to the Hamilton County (20,062 tons per year), or the overall CMSA (30,891 tons per year), and low VOC emissions (1,572 tons per year) compared to Hamilton County (27,103 tons per year), or the overall CMSA (36,324 tons per year). Dade County did not exceed any of the State's criteria for inclusion into a nonattainment area.

Macon

Twiggs County:

EPA concurs with the State of Georgia's decision to recommend Twiggs County as attainment. Twiggs County is an CMSA county, but has very low population (10,590) as compared to Bibb County's population (153,887), or the overall CMSA population (322,549), no expected population growth (0 percent), low NOx (2,257 tons/year), and VOC emissions (1,187 tons/year). Twiggs County did not exceed any of the State's criteria for inclusion into a nonattainment area, as discussed above.

Peach County:

EPA concurs with the State of Georgia's decision to recommend Peach County as attainment. Peach County is an CMSA county, has a population growth (16 percent) but has very low population (23,668) as compared to Bibb County's population (153,887), or the overall CMSA population (322,549), and low NOx emissions (2,029 tons per year - 9 percent of the CMSA emissions), and VOC emissions (2,220 tons per year - 11 percent of the CMSA emissions). Peach County did not exceed any of the State's criteria for inclusion into a nonattainment area, as discussed above.

Jones County:

EPA concurs with the State of Georgia's decision to recommend Jones County as attainment. Jones County is a CMSA county, has a population growth of 17 percent, but a very low population (23,639) as compared to Bibb County's (153,887), or the overall CMSA population (322,549), low NOx emissions (1,471 tons per year - 6 percent of the CMSA

emissions), and low VOC emissions (1,510 tons per year - 7 percent of the CMSA emissions) . Jones County did not exceed any of the State's criteria for inclusion into a nonattainment area, as discussed above.